

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

UNITED STATES OF AMERICA            )  
  ) No.  
  ) v.  
  ) ANNE AROSTE,  
  ) Sections 1028A(a)(1) and 1343  
  ) aka "Ann Aroste"  
  )

**COUNT ONE**

The SPECIAL FEBRUARY 2017 GRAND JURY charges:

1. At times material to this indictment:

*Old-Age, Survivors, and Disability Insurance Program*

a. The Social Security Act established the Old-Age, Survivors, and Disability Insurance program, which provided monthly benefits to qualified retired and disabled workers, their dependents, and to survivors of insured workers.

b. The Social Security Administration, an agency of the United States, administered the Old-Age, Survivors, and Disability Insurance program.

c. Workers contributed to the Old-Age, Survivors, and Disability Insurance program through payroll taxes and self-employment taxes.

d. Employers filed wage reports with the Social Security Administration showing the wages paid to their workers. The Internal Revenue Service provided information to the Social Security Administration concerning workers' self-employment earnings. Reported earnings were posted to the worker's Social Security earnings record.

e. When a worker or a member of a worker's family applied for Social Security benefits, the Social Security Administration used the worker's Social Security earnings record to determine whether the applicant was eligible for benefits and, if so, to calculate the benefit amount.

f. Certain survivors of an insured worker were eligible to receive Social Security survivor's benefits based on the deceased worker's earnings, including divorced spouses of the deceased worker.

g. A surviving divorced spouse of an insured worker could receive Social Security benefits if, among other things, the marriage lasted ten years or longer.

h. If a surviving divorced spouse of an insured worker was not a United States citizen, additional eligibility requirements needed to be met in order for the non-citizen to receive monthly benefit payments.

i. The Social Security benefits paid to a surviving divorced spouse did not affect the amount of benefits paid to other survivors who collected benefits on the insured worker's Social Security earnings record.

j. When a payment of benefits was authorized in the Social Security Administration's electronic system, payment information was sent electronically to the United States Department of the Treasury, which would then issue the payment to the beneficiary.

*Defendant*

k. Defendant ANNE AROSTE was a resident of Montgomery, Illinois. In or around April 2008, AROSTE began working for the Social Security Administration on a full-time basis. Between in or around May 2012 and in or around May 2018, AROSTE was employed by the Social Security Administration as a claims specialist at the agency's field office in Aurora, Illinois. As part of her job, AROSTE was responsible for, among other things, processing applications for Social Security benefits, including by using her credentials to access the Social Security Administration's electronic records system.

1. Defendant ANNE AROSTE controlled certain bank accounts, including Alliant Credit Union account ending in 6811; Bank of America account ending in 6127; J.P. Morgan Chase Bank account ending in 6510; U.S. Bank account ending in 5169; and U.S. Bank account ending in 8902.

2. Beginning no later than in or around August 2013, and continuing until in or around May 2018, at Aurora, in the Northern District of Illinois, Eastern Division,

ANNE AROSTE,  
aka "Ann Aroste,"

defendant herein, knowingly devised, intended to devise, and participated in a scheme to defraud and obtain money from the Social Security Administration by means of materially false and fraudulent pretenses and representations, and by concealment of material facts, which scheme is further described in the following paragraphs.

3. It was part of the scheme that defendant ANNE AROSTE used her employee credentials to create, process, and approve fraudulent applications for Social

Security benefits, causing the Social Security Administration to issue at least approximately \$680,962 in payments to fictitious beneficiaries. AROSTE caused the United States Department of the Treasury to deposit the Social Security benefits into certain bank accounts that AROSTE controlled.

4. It was further part of the scheme that, in creating fictitious beneficiaries to list as applicants on the fraudulent applications for Social Security benefits, defendant ANNE AROSTE used her employee credentials to alter people's Social Security records.

5. It was further part of the scheme that defendant ANNE AROSTE used her employee credentials to create fraudulent applications for Social Security benefits on the Social Security earnings records of deceased insured workers.

6. It was further part of the scheme that defendant ANNE AROSTE used her employee credentials to approve the fraudulent applications for Social Security benefits which she had created.

7. It was further part of the scheme that defendant ANNE AROSTE used her employee credentials to enter bank routing and account information in the Social Security Administration's electronic records system, causing the United States Department of the Treasury to deposit fraudulent Social Security benefit payments into the Alliant Credit Union, Bank of America, J.P. Morgan Chase Bank, and U.S. Bank accounts that she controlled.

*Fraudulent Application in the Name of Individual A*

8. It was further part of the scheme that, between in or around September 2014 and in or around October 2014, defendant ANNE AROSTE caused an application for Social Security benefits to be submitted in the name of Individual A, falsely claiming that Individual A had been married to Individual D.M., a deceased insured worker.

9. It was further part of the scheme that in or around September 2014, defendant ANNE AROSTE used her employee credentials to alter information in the Social Security Administration's electronic records system concerning Individual A, who was assigned social security number ending 3396. AROSTE changed Individual A's name and falsely represented that Individual A was a United States citizen.

10. It was further part of the scheme that between in or around September 2014 and in or around October 2014, defendant ANNE AROSTE used her employee credentials to create a fraudulent application by Individual A for Social Security survivor's benefits based on the Social Security earnings record of Individual D.M.

11. It was further part of the scheme that defendant ANNE AROSTE falsely represented on the application that Individual A married Individual D.M. in or around August 1990 and that they remained married until Individual D.M. died in or around September 1998.

12. It was further part of the scheme that in or around October 2014, defendant ANNE AROSTE used her employee credentials to approve the fraudulent application for Social Security survivor's benefits which she had created in the name of Individual A based on the Social Security earnings record of Individual D.M. Thereafter,

on or about October 6, 2014, the Social Security Administration, by way of the United States Department of the Treasury, deposited approximately \$17,082 into a U.S. Bank account controlled by AROSTE.

*Fraudulent Application in the Name of Individual B*

13. It was further part of the scheme that, between in or around July 2015 and in or around August 2015, defendant ANNE AROSTE caused an application for Social Security benefits to be submitted in the name of Individual B, falsely claiming that Individual B had been married to Individual L.K., a deceased insured worker.

14. It was further part of the scheme that in or around July 2015, defendant ANNE AROSTE used her employee credentials to alter information in the Social Security Administration's electronic records system concerning Individual B, who was assigned social security number ending 1621. AROSTE changed Individual B's name and falsely represented that Individual B was a United States citizen.

15. It was further part of the scheme that between in or around July 2015 and in or around August 2015, defendant ANNE AROSTE used her employee credentials to create a fraudulent application by Individual B for Social Security survivor's benefits based on the Social Security earnings record of Individual L.K.

16. It was further part of the scheme that defendant ANNE AROSTE falsely represented on the application that Individual B married Individual L.K. in or around February 1965 and that they divorced in or around May 1976.

17. It was further part of the scheme that in or around August 2015, defendant ANNE AROSTE used her employee credentials to approve the fraudulent application

for Social Security survivor's benefits which she had created in the name of Individual B based on the Social Security earnings record of Individual L.K. Thereafter, on or about September 24, 2015, the Social Security Administration, by way of the United States Department of the Treasury, deposited approximately \$11,235 into a U.S. Bank account controlled by AROSTE.

*Fraudulent Application in the Name of Individual C*

18. It was further part of the scheme that, between in or around June 2015 and in or around March 2016, defendant ANNE AROSTE caused an application for Social Security benefits to be submitted in the name of Individual C, falsely claiming that Individual C had been married to Individual S.J., a deceased insured worker.

19. It was further part of the scheme that in or around June 2015, defendant ANNE AROSTE used her employee credentials to alter information in the Social Security Administration's electronic records system concerning Individual C, who was assigned social security number ending 5979. AROSTE changed Individual C's name and the names of Individual C's parents.

20. It was further part of the scheme that in or around March 2016, defendant ANNE AROSTE used her employee credentials to create a fraudulent application by Individual C for Social Security survivor's benefits based on the Social Security earnings record of Individual S.J.

21. It was further part of the scheme that defendant ANNE AROSTE falsely represented on the application that Individual C married Individual S.J. in or around May 1973 and that they divorced in or around February 1984.

22. It was further part of the scheme that in or around March 2016, defendant ANNE AROSTE used her employee credentials to approve the fraudulent application for Social Security survivor's benefits which she had created in the name of Individual C based on the Social Security earnings record of Individual S.J. Thereafter, on or about March 17, 2016, the Social Security Administration, by way of the United States Department of the Treasury, deposited approximately \$27,720 into a J.P. Morgan Chase Bank account controlled by AROSTE.

*Fraudulent Application in the Name of Individual D*

23. It was further part of the scheme that in or around February 2017, defendant ANNE AROSTE caused an application for Social Security benefits to be submitted in the name of Individual D, falsely claiming that Individual D had been married to Individual J.S., a deceased insured worker.

24. It was further part of the scheme that in or around February 2017, defendant ANNE AROSTE used her employee credentials to alter information in the Social Security Administration's electronic records system concerning Individual D, who was assigned social security number ending 5423. AROSTE falsely represented that Individual D was a United States citizen.

25. It was further part of the scheme that in or around February 2017, defendant ANNE AROSTE used her employee credentials to create a fraudulent application by Individual D for Social Security survivor's benefits based on the Social Security earnings record of Individual J.S.



26. It was further part of the scheme that defendant ANNE AROSTE falsely represented on the application that Individual D married Individual J.S. in or around May 1991 and that they divorced in or around July 2005.

27. It was further part of the scheme that in or around February 2017, defendant ANNE AROSTE used her employee credentials to approve the fraudulent application for Social Security survivor's benefits which she had created in the name of Individual D based on the Social Security earnings record of Individual J.S. Thereafter, on or about March 2, 2017, the Social Security Administration, by way of the United States Department of the Treasury, deposited approximately \$4,044 into a U.S. Bank account controlled by AROSTE.

*Fraudulent Application in the Name of Individual E*

28. It was further part of the scheme that, between in or around February 2017 and in or around March 2017, defendant ANNE AROSTE caused an application for Social Security benefits to be submitted in the name of Individual E, falsely claiming that Individual E had been married to Individual D.M., a deceased insured worker.

29. It was further part of the scheme that between in or around February 2017 and in or around March 2017, defendant ANNE AROSTE used her employee credentials to alter information in the Social Security Administration's electronic records system concerning Individual E, who was assigned social security number ending 2104. AROSTE changed Individual E's name and falsely represented that Individual E was a United States citizen.

30. It was further part of the scheme that in or around March 2017, defendant ANNE AROSTE used her employee credentials to create a fraudulent application by Individual E for Social Security survivor's benefits based on the Social Security earnings record of Individual D.M.

31. It was further part of the scheme that defendant ANNE AROSTE falsely represented on the application that Individual E married Individual D.M. in or around May 1971 and that they divorced in or around September 1981.

32. It was further part of the scheme that in or around March 2017, defendant ANNE AROSTE used her employee credentials to approve the fraudulent application for Social Security survivor's benefits which she had created in the name of Individual E based on the Social Security earnings record of Individual D.M. Thereafter, on or about March 20, 2017, the Social Security Administration, by way of the United States Department of the Treasury, deposited approximately \$29,169 into a U.S. Bank account controlled by AROSTE.

33. It was further part of the scheme that defendant ANNE AROSTE misrepresented, concealed, and hid, and caused to be misrepresented concealed, and hidden, the existence and purpose of the scheme and the acts done in furtherance of the scheme.

34. On or about October 6, 2014, at Aurora, in the Northern District of Illinois, Eastern Division,

ANNE AROSTE,  
aka "Ann Aroste,"

defendant herein, for the purpose of executing the above-described scheme, knowingly caused to be transmitted in interstate commerce by means of a wire communication from the Federal Reserve Bank in East Rutherford, New Jersey, to U.S. Bank in Denver, Colorado, certain writings, signs, and signals, namely, a wire funds transfer of Social Security benefits in the amount of \$17,082;

In violation of Title 18, United States Code, Section 1343.

**COUNT TWO**

The SPECIAL FEBRUARY 2017 GRAND JURY further charges:

On or about October 2, 2014, at Aurora, in the Northern District of Illinois,  
Eastern Division,

ANNE AROSTE,  
aka "Ann Aroste,"

defendant herein, knowingly possessed and used, without lawful authority, a means of identification of another person, namely, the name, date of birth, and social security number of Individual D.M., during and in relation to the offense of wire fraud, in violation of Title 18, United States Code, Section 1343, as described in Count One of this Indictment, knowing that the means of identification belonged to Individual D.M.;

In violation of Title 18, United States Code, Section 1028A(a)(1).

### **COUNT THREE**

The SPECIAL FEBRUARY 2017 GRAND JURY further charges:

1. Paragraphs 1 through 33 of Count One are incorporated here.
2. On or about September 24, 2015, at Aurora, in the Northern District of Illinois, Eastern Division,

ANNE AROSTE,  
aka "Ann Aroste,"

defendant herein, for the purpose of executing the above-described scheme, knowingly caused to be transmitted in interstate commerce by means of a wire communication from the Federal Reserve Bank in East Rutherford, New Jersey, to U.S. Bank in Denver, Colorado, certain writings, signs, and signals, namely, a wire funds transfer of Social Security benefits in the amount of \$11,235;

In violation of Title 18, United States Code, Section 1343.

**COUNT FOUR**

The SPECIAL FEBRUARY 2017 GRAND JURY further charges:

On or about August 8, 2015, at Aurora, in the Northern District of Illinois,  
Eastern Division,

ANNE AROSTE,  
aka "Ann Aroste,"

defendant herein, knowingly possessed and used, without lawful authority, a means of identification of another person, namely, the name, date of birth, and social security number of Individual L.K., during and in relation to the offense of wire fraud, in violation of Title 18, United States Code, Section 1343, as described in Count Three of this Indictment, knowing that the means of identification belonged to Individual L.K.;

In violation of Title 18, United States Code, Section 1028A(a)(1).

**COUNT FIVE**

The SPECIAL FEBRUARY 2017 GRAND JURY further charges:

1. Paragraphs 1 through 33 of Count One are incorporated here.
2. On or about March 17, 2016, at Aurora, in the Northern District of Illinois, Eastern Division,

ANNE AROSTE,  
aka "Ann Aroste,"

defendant herein, for the purpose of executing the above-described scheme, knowingly caused to be transmitted in interstate commerce by means of a wire communication from the Federal Reserve Bank in East Rutherford, New Jersey, to J.P. Morgan Chase Bank in Tampa, Florida, certain writings, signs, and signals, namely, a wire funds transfer of Social Security benefits in the amount of \$27,720;

In violation of Title 18, United States Code, Section 1343.

**COUNT SIX**

The SPECIAL FEBRUARY 2017 GRAND JURY further charges:

On or about March 7, 2016, at Aurora, in the Northern District of Illinois, Eastern Division,

ANNE AROSTE,  
aka "Ann Aroste,"

defendant herein, knowingly possessed and used, without lawful authority, a means of identification of another person, namely, the name, date of birth, and social security number of Individual S.J., during and in relation to the offense of wire fraud, in violation of Title 18, United States Code, Section 1343, as described in Count Five of this Indictment, knowing that the means of identification belonged to Individual S.J.;

In violation of Title 18, United States Code, Section 1028A(a)(1).



**COUNT SEVEN**

The SPECIAL FEBRUARY 2017 GRAND JURY further charges:

1. Paragraphs 1 through 33 of Count One are incorporated here.
2. On or about March 2, 2017, at Aurora, in the Northern District of Illinois, Eastern Division,

ANNE AROSTE,  
aka "Ann Aroste,"

defendant herein, for the purpose of executing the above-described scheme, knowingly caused to be transmitted in interstate commerce by means of a wire communication from the Federal Reserve Bank in East Rutherford, New Jersey, to U.S. Bank in Denver, Colorado, certain writings, signs, and signals, namely, a wire funds transfer of Social Security benefits in the amount of \$4,044;

In violation of Title 18, United States Code, Section 1343.

**COUNT EIGHT**

The SPECIAL FEBRUARY 2017 GRAND JURY further charges:

On or about February 29, 2017, at Aurora, in the Northern District of Illinois,  
Eastern Division,

ANNE AROSTE,  
aka "Ann Aroste,"

defendant herein, knowingly possessed and used, without lawful authority, a means of identification of another person, namely, the name, date of birth, and social security number of Individual J.S., during and in relation to the offense of wire fraud, in violation of Title 18, United States Code, Section 1343, as described in Count Seven of this Indictment, knowing that the means of identification belonged to Individual J.S.;

In violation of Title 18, United States Code, Section 1028A(a)(1).

**COUNT NINE**

The SPECIAL FEBRUARY 2017 GRAND JURY further charges:

1. Paragraphs 1 through 33 of Count One are incorporated here.
2. On or about March 20, 2017, at Aurora, in the Northern District of Illinois, Eastern Division,

ANNE AROSTE,  
aka "Ann Aroste,"

defendant herein, for the purpose of executing the above-described scheme, knowingly caused to be transmitted in interstate commerce by means of a wire communication from the Federal Reserve Bank in East Rutherford, New Jersey, to U.S. Bank in Denver, Colorado, certain writings, signs, and signals, namely, a wire funds transfer of Social Security benefits in the amount of \$29,169;

In violation of Title 18, United States Code, Section 1343.

**COUNT TEN**

The SPECIAL FEBRUARY 2017 GRAND JURY further charges:

On or about March 13, 2017, at Aurora, in the Northern District of Illinois,  
Eastern Division,

ANNE AROSTE,  
aka "Ann Aroste,"

defendant herein, knowingly possessed and used, without lawful authority, a means of identification of another person, namely, the name, date of birth, and social security number of Individual D.M., during and in relation to the offense of wire fraud, in violation of Title 18, United States Code, Section 1343, as described in Count Nine of this Indictment, knowing that the means of identification belonged to Individual D.M.;

In violation of Title 18, United States Code, Section 1028A(a)(1).

## FORFEITURE ALLEGATION

The SPECIAL FEBRUARY 2017 GRAND JURY alleges:

1. Upon conviction of an offense in violation of Title 18, United States Code, Section 1343, as set forth in this indictment, defendant shall forfeit to the United States of America any property which constitutes and is derived from proceeds traceable to the offense, as provided in Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c).

2. The property to be forfeited includes, but is not limited to, a personal money judgment in the amount of approximately \$680,962, including:

a. up to approximately \$180,160 in funds in U.S. Bank account ending in 8902;

b. up to approximately \$95,370 in funds in U.S. Bank account ending in 5169;

c. up to approximately \$179,669 in funds in Bank of America account ending in 6127; and

d. up to approximately \$27,555 in funds in Alliant Credit Union account ending in 6811.

3. If any of the property described above, as a result of any act or omission by defendant cannot be located upon the exercise of due diligence; has been transferred or sold to, or deposited with, a third party; has been placed beyond the jurisdiction of the Court; has been substantially diminished in value; or has been commingled with other property which cannot be divided without difficulty, the United States of America shall

be entitled to forfeiture of substitute property, as provided in Title 21, United States Code, Section 853(p).

A TRUE BILL:

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FOREPERSON

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UNITED STATES ATTORNEY